



AIR POLLUTION CONTROL DISTRICT OF JEFFERSON COUNTY, KENTUCKY
TITLE V OPERATING PERMIT

Permit No.: 91-97-TV

Co/Plant ID: 0989

Effective Date: 15 January 2000

Expiration Date: 15 January 2005

UTM Northing: 4227.7

UTM Easting: 616.3

SIC: 7216

NAICS: 81232 AFS: 00989

Permission is hereby given by the Air Pollution Control District of Jefferson County to operate equipment located at:

Sam Meyers, Inc
3400 Bashford Ave Court
Louisville, Kentucky 40218-3163

in accordance with the permit application on file with the District and under the conditions in the permit. This permit and the authorization to operate the emission units listed shall expire on midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the owner or operator may continue to operate in accordance with the terms and conditions of this permit beyond the expiration date, provided that a complete renewal application is submitted to the District no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Applicant for Permit: Pat Corbett

Title of Applicant: Vice President

Date Application Received: 27 April 1995; 08 November 1999

Date Application Administratively Complete: 08 June 1995; 12 November 1999

Date Public Notice Given: 21 November 1999

Reviewing Engineer (16)

Air Pollution Control Officer

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ABBREVIATIONS AND ACRONYMS

AC	- Additional Condition
APCD	- Air Pollution Control District
ASL	- Adjusted Significant Level
atm	- Atmosphere
BACT	- Best Available Control Technology
Btu	- British Thermal Unit
°C	- Degrees Centigrade
CEMS	- Continuous Emission Monitoring System
CAAA	- Clean Air Act Amendments (15 November 1990)
cf	- Cubic foot
DOE	- District Only Enforceable
°F	- Degrees Fahrenheit
gal	- Gallon
HAP	- Hazardous Air Pollutant
Hg	- Mercury
hr	- hour
lbs	- Pounds
l	- Liter
MACT	- Maximum Available Control Technology
m	- Meter
mg	- Milligram
mm	- Millimeter
MM	- Million
MOCS	- Management of Change System
NAICS	- North American Industrial Classification System
NSR	- New Source Review
NO _x	- Nitrogen oxides
NSPS	- New Source Performance Standards
PM	- Particulate Matter
PM ₁₀	- Particulate matter less than 10 microns
ppm	- Parts per million
PSD	- Prevention of Significant Deterioration
PMP	- Preventive Maintenance Plan
psia	- Pounds per square inch absolute
RACT	- Reasonably Available Control Technology
SIC	- Standard Industrial Classification
SIP	- State Implementation Plan
SO ₂	- Sulfur dioxide
TAL	- Threshold Ambient Limit
TAP	- Toxic Air Pollutant
tpy	- Tons per year
VOC	- Volatile Organic Compound

GENERAL CONDITIONS PREAMBLE

Title V of the Clean Air Act Amendments of 1990 required EPA to create an operating permit program for implementation by state or local air permitting authorities. The purposes of this program are (1) to require an affected company to assume full responsibility for demonstrating compliance with applicable regulations; (2) to capture all of the regulatory information pertaining to an affected company in a single document; and (3) to make permits more consistent with each other.

A company is subject to the Title V program if it meets any of several criteria related to the nature or amount of its emissions. The Title V operating permit specifies what the affected company is, how it may operate, what its applicable regulations are, how it will demonstrate compliance, and what is required if compliance is not achieved. In Jefferson County, Kentucky, the Air Pollution Control District (APCDJC) is responsible for issuing Title V permits to affected companies and enforcing local regulations and delegated federal and state regulations. EPA may enforce federal regulations but not "District Only Enforceable Regulations".

Title V offers the public an opportunity to review and comment on a company's draft permit. It is intended to help the public understand the company's compliance responsibility under the Clean Air Act. Additionally, the Title V process provides a mechanism to incorporate new applicable requirements. Such requirements are available to the public for review and comment before they are adopted.

Title V Permit general conditions define requirements which are generally applicable to all Title V companies under the jurisdiction of APCDJC. This avoids repeating these requirements in every section of the company's Title V permit. Company-specific conditions augment the general conditions as necessary; these appear in the sections of the permit addressing individual emission units or emission points.

The general conditions include references to regulatory requirements that may not currently apply to the company, but which provide guidance for potential changes at the company or in the regulations during the life of the permit. Such requirements may become applicable if the company makes certain modifications or a new applicable requirement is adopted.

When the applicability of a section or subpart of a regulation is unclear, a clarifying citation will be made in the company's Title V permit at the emission unit/point level. Comments may also be added at the emission unit/point level to give further clarification or explanation.

The company's Title V permit may include a list of "insignificant activities" for informational purposes. By definition, "insignificant activities" identified by the company in its permit application and approved by the District are not subject to any applicable requirements, such as monitoring, recordkeeping, or reporting.

GENERAL CONDITIONS

1. **Compliance** - The owner or operator shall comply with all applicable requirements and with all terms and conditions of this permit. Any noncompliance shall constitute a violation of the Act, State and District regulations and shall cause the source to be subject to enforcement actions including, but not limited to, the termination, revocation and reissuance, or revision of this permit, or denial of a permit application to renew this permit. Notwithstanding any other provision in the Jefferson County portion of the Kentucky SIP approved by EPA, any credible evidence may be used for the purpose of establishing whether the owner or operator is in compliance with, has violated, or is in violation of any such plan. (Regulation 2.16, sections 4.1.3, 4.1.13.1 and 4.1.13.7)
2. **Compliance Certification** - The owner or operator shall certify, annually or more frequently if required in applicable regulations, compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. This certification shall meet the requirements of Regulation 2.16, sections 3.5.11 and 4.3.5. The owner or operator shall submit the annual compliance certification directly to the following address as well as to the District, as set forth in Regulation 2.16, section 4.3.5.4:

***US EPA - Region IV
Air Enforcement Branch
Atlanta Federal Center
61 Forsyth Street
Atlanta, GA 30303-8960***

3. **Compliance Schedule** - A compliance schedule must meet the requirements of Regulation 2.16, section 3.5.9.5. The owner or operator shall submit a schedule of compliance for each emission unit that is not in compliance with all applicable requirements. A schedule of compliance shall be supplemental to, and shall not condone noncompliance with, the applicable requirements on which it is based. For each schedule of compliance, the owner or operator shall submit certified progress reports at least semi-annually, or at a more frequent period if specified in an applicable requirement or by the District in accordance with Regulation 2.16 section 4.3.4. The progress reports shall contain:
 - a. Dates for achieving the activities, milestones, or compliance required in the schedule of compliance, and dates when activities, milestones, or compliance were achieved.
 - b. An explanation of why dates in the schedule of compliance were not or will not be met, and preventive or corrective measures adopted.
4. **Duty to Supplement or Correct Application** - If the owner or operator fails to submit relevant facts or has submitted incorrect information in the permit application, it shall, upon discovery of the occurrence, promptly submit the supplementary facts or corrected information in accordance with Regulation 2.16, section 3.4.
5. **Emergency Provision**

- a. An emergency shall constitute an affirmative defense to an enforcement action brought for noncompliance with technology-based emission limitations. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:
 - (I) An emergency occurred and that the owner or operator can identify the cause of the emergency.
 - (ii) The permitted facility was at the time being properly operated.
 - (iii) During the period of the emergency the owner or operator expeditiously took all reasonable steps, consistent with safe operating practices, to minimize levels of emissions that exceeded the emission standards or other requirements in this permit.
 - (iv) The owner or operator submitted notice meeting the requirements of Regulation 1.07 of the time when emissions limitations were exceeded because of the emergency. This notice must fulfill the requirement of this condition, and must contain a description of the emergency, any steps taken to mitigate emissions, and any corrective actions taken.
 - b. In an enforcement proceeding, the owner or operator seeking to establish the occurrence of an emergency has the burden of proof.
 - c. This condition is in addition to any emergency or upset provision contained in an applicable requirement.
(Regulation 2.16, sections 4.7.1 through 4.7.4)
6. **Emission Fees Payment Requirements** - The owner or operator shall pay annual emission fees in accordance with Regulation 2.08. Failure to pay the emissions fees when due shall constitute a violation of District Regulations. Such failure is subject to penalties and an increase in the fee of an additional 5% per month up to a maximum of 25% of the original amount due. In addition, failure to pay emissions fees within 60 days of the due date shall automatically suspend this permit to operate until the fee is paid or a schedule for payment acceptable to the District has been established. (Regulation 2.08, section 1.3)
 7. **Emission Offset Requirements** - The owner or operator shall comply with the requirements of Regulation 2.04.
 8. **Enforceability Requirements** - Except for the conditions that are specifically designated as "District Only Enforceable Conditions", all terms and conditions of this permit, including any provisions designed to limit a source's potential to emit, are enforceable by EPA and citizens as specified under the Act. (Regulation 2.16, sections 4.2.1 and 4.2.2)

9. **Enforcement Action Defense**

- a. It shall not be a defense for the owner or operator in an enforcement action that it would have been necessary for the owner or operator to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- b. The owner or operator's failure to halt or reduce activity may be a mitigating factor in assessing penalties for noncompliance if the health, safety or environmental impacts of halting or reducing operations would be more serious than the impacts of continued operation.

(Regulation 2.16, sections 4.1.13.2 and 4.1.13.3)

10. **Hazardous Air Pollutants and Sources Categories** - The owner or operator shall comply with the applicable requirements of Regulations 5.02 and 5.14.

11. **Information Requests** - The owner or operator shall furnish to the District, within a reasonable time, information requested in writing by the District, to determine whether cause exists for revising, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The owner or operator shall also furnish, upon request, copies of records required to be kept by this permit. (Regulation 2.16, section 4.1.13.6) If information is submitted to the District under a claim of confidentiality, the source shall submit a copy of the confidential information directly to EPA. (Regulation 2.07, section 10.2)

12. **Insignificant Activities** - The owner or operator shall notify the District in a timely manner of any proposed change to an insignificant activity that would require a permit revision. (Regulation 2.16, section 5)

13. **Inspection and Entry** - Upon presentation of credentials and other documents as required by law, the owner or operator shall allow the District or an authorized representative to perform the following during reasonable hours:

- a. Enter the premises to inspect any emissions-related activity or records required in this permit.
- b. Have access to and copy records required by this permit.
- c. Inspect facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required by this permit.
- d. Sample or monitor substances or parameters to assure compliance with this permit or any applicable requirements.

(Regulation 2.16, section 4.3.2)

14. **Monitoring and Related Recordkeeping and Reporting Requirements** - The owner or operator shall comply with the requirements of Regulation 2.16, section 4.1.9. The

owner or operator shall submit all required monitoring reports at least once every six months, unless more frequent reporting is required by an applicable requirement. The reporting period shall be January 1st through June 30th and July 1st through December 31st of each calendar year. All reports shall be postmarked by the 60th day following the end of each reporting period. If surrogate operating parameters are monitored and recorded in lieu of emission monitoring, then an exceedance of multiple parameters may be deemed a single violation by the District for enforcement purposes.

15. **Off-permit Documents** - Any applicable requirements, including emission limitations, control technology requirements, or work practice standards, contained in an off-permit document cannot be changed without undergoing the permit revision procedures in Regulation 2.16, Section 5.
16. **Operational Flexibility** - The owner or operator may make changes without permit revision in accordance with Regulation 2.16, section 5.8.
17. **Permit Amendments (Administrative)** - This permit can be administratively amended by the District in accordance with Regulation 2.16, sections 2.3 and 5.4.
18. **Permit Application Submittal** - The owner or operator shall submit a timely and complete application for permit renewal or significant revision. If the owner or operator submits a timely and complete application then the owner or operator's failure to have a permit is not a violation until the District takes formal action on this permit application. This protection shall cease to apply if, subsequent to completeness determination, the owner or operator fails to submit, by the deadline specified in writing by the District, additional information required to process the application as required by Regulation 2.16, sections 3 and 5.2.
19. **Permit Duration** - This permit is issued for a fixed term of 5 years, in accordance with Regulation 2.16, section 4.1.8.3.
20. **Permit Renewal, Expiration and Application** - Permit renewal, expiration and application procedural requirements shall be in accordance with Regulation 2.16, sections 4.1.8.2 and 5.3. This permit may only be renewed in accordance with section 5.3.
21. **Permit Revisions** - No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in the permit. (Regulation 2.16, section 4.1.16)
22. **Permit Revision Procedures (Minor)** - Except as provided in 40 CFR Part 72, the Acid Rain Program, this permit may be revised in accordance with Regulation 2.16, section 5.5.
23. **Permit Revision Procedures (Significant)** - A source seeking to make a significant permit revision shall meet all the Title V requirements for permit applications, issuance and renewal, in accordance with Regulation 2.16, section 5.7, and all other applicable District Regulations.

24. **Permit Revocation and Termination by the District** - The District may terminate this permit only upon written request of the owner or operator. The District may revoke a permit for cause, in accordance with Regulation 2.16, section 5.11.1.1 through 5.11.1.5. For purposes of Section 5, substantial or unresolved noncompliance includes, but is not limited to:
- a. Knowingly operating process or air pollution control equipment in a manner not allowed by an applicable requirement or that results in excess emissions of a regulated air pollutant that would endanger the public or the environment.
 - b. Failure or neglect to furnish information, analyses, plans, or specifications required by the District.
 - c. Knowingly making any false statement in any permit application.
 - d. Noncompliance with Regulation 1.07, section 4.2; or
 - e. Noncompliance with KRS Chapter 77.
25. **Permit Shield** - The permit shield shall apply in accordance with Regulation 2.16, section 4.6.1.
26. **Prevention of Significant Deterioration of Air Quality** - The owner or operator shall comply with the requirements of Regulation 2.05.
27. **Property Rights** - This permit shall not convey property rights of any sort or grant exclusive privileges in accordance with Regulation 2.16, section 4.1.13.5.
28. **Public Participation** - Except for modifications qualifying for administrative permit amendments or minor permit revision procedures, all permit proceedings shall meet the requirements of Regulations 2.07, Section 1; and 2.16, sections 5.1.1.2 and 5.5.4.
29. **Reopening For Cause** - This permit shall be reopened and revised by the District in accordance with Regulation 2.16 section 5.9.
30. **Reopening for Cause by EPA** - This permit may be revised, revoked and reissued or terminated for cause by EPA in accordance with Regulation 2.16 section 5.10.
31. **Risk Management Plan (112(r))** - For each process subject to Section 112(r) of the Act, the owner or operator shall comply with 40 CFR Part 68 and Regulation 5.15.
32. **Severability Clause** - The conditions of this permit are severable. Therefore, if any condition of this permit, or the application of any condition of this permit to any specific circumstance, is determined to be invalid, the application of the condition in question to other circumstances, as well as the remainder of this permit's conditions, shall not be affected. (Regulation 2.16, section 4.1.12)

33. **Stack Height Considerations** - The owner or operator shall comply with the requirements of Regulation 2.10.
34. **Startups, Shutdowns, and Malfunctions Requirements** - The owner or operator shall comply with the requirements of Regulation 1.07.
35. **Submittal of Reports, Data, Notifications, and Applications**
- a. Applications, reports, test data, monitoring data, compliance certifications, and any other document required by this permit as set forth in Regulation 2.16 sections 3.1, 3.4, 3.5, 4.1.13.6, 5.8.5 and 5.11.7 shall be submitted to:

***Air Pollution Control District of Jefferson County
850 Barret Ave
Louisville, KY 40204-1745***

- b. Documents which are specifically required to be submitted to EPA as set forth in Regulation 2.16 sections 3.3, and 5.8.5 shall be mailed to EPA at the following address:

***US EPA - Region IV
APTMD - 12th floor
Atlanta Federal Center
61 Forsyth Street
Atlanta, GA 30303-3104***

36. **Other Applicable Regulations** - The owner or operator shall comply with all applicable requirements of the following regulations:

FEDERALLY ENFORCEABLE REGULATIONS	
Regulation	Title
1.01	General Application of Regulations and Standards
1.02	Definitions
1.03	Abbreviations and Acronyms
1.04	Performance Tests
1.05	Compliance with Emission Standards and Maintenance Requirements
1.06	Source Self-Monitoring and Reporting
1.07	Emissions During Startups, Shutdowns, Malfunctions, and Emergencies
1.08	Administrative Procedures
1.09	Prohibition of Air Pollution
1.10	Circumvention
1.11	Control of Open Burning

FEDERALLY ENFORCEABLE REGULATIONS	
Regulation	Title
1.14	Control of Fugitive Particulate Emissions
2.01	General Application
2.02	Air Pollution Regulation Requirements and Exemptions
2.03	Permit Requirements - Non-Title V Construction and Operating Permits and Demolition/Renovation Permits
2.07	Public Notification for Title V, PSD, and Offset Permits; SIP Revisions; and Use of Emission Reduction Credits
2.09	Cause for Permit Suspension
2.10	Stack Height Considerations
2.11	Air Quality Model Usage
2.16	Title V Operating Permits
4.01	General Provisions for Emergency Episodes
4.02	Episode Criteria
4.03	General Abatement Requirements
4.07	Episode Reporting Requirements
5.01	General Provisions (for Hazardous Air Pollutants)
5.03	Potential Hazardous Emissions
6.01	General Provisions (for <i>Existing Affected Facilities</i>)
6.02	Emission Monitoring for Existing Sources
7.01	General Provisions (for <i>New Affected Facilities</i>)

DISTRICT ONLY ENFORCEABLE REGULATIONS	
Regulation	Title
1.12	Control of Nuisances
1.13	Control of Objectionable Odors in the Ambient Air
2.08	Emissions Fees, Permit Fees, and Permit Renewal Procedures
8.03	Commuter Vehicle Testing Requirements

Emission Unit Number: U1

Emission Unit Description: Petroleum solvent dry cleaning system installed in April 1994

Emission Unit Applicable Regulations:

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
1.05	Compliance with Emission Standards and Maintenance Requirements	1, 2, 4, and 5
6.24	Standards of Performance for Existing Sources Using Organic Materials	1, 2, 3.3, 4 & 5
7.12	Standard of Performance for New Storage Vessels for Volatile Organic Compounds	1, 2, 3.3, 4.1, 4.2, 5.1 & 5.2

DISTRICT ONLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
5.14	Hazardous Air Pollutants and Source Categories	1 and 2

Emission Unit Allowable Emissions:

VOC 450 lbs/hr and 3000 lbs/day

Emission Unit Components:

E1- Dryer Unit - Stack 1, installed 30 Oct 1953	E5- Washer
E2- Dryer Unit - Stack 2, installed 16 Feb 1956	E6- Washer
E3- Dryer Unit - Stack 3, installed 16 Feb 1956	E7- 1000 gallon solvent storage tank
E4- Dryer Unit - Stack 4, installed 18 Jan 1966	

Additional Conditions**1. Standard for Organic Materials (Reg 6.24, Section 3)**

a) The owner or operator shall comply with the following emission standards:

- (1) Class I Solvents - No owner or operator shall discharge into the atmosphere more than 15 pounds of organic materials in any one day, or more than 3 pounds in any one hour, from any existing affected facility in which any Class I solvent is used unless said discharge has been reduced by at least 85% by weight. (Section 3.1)
- (2) Class II Solvents - No owner or operator shall discharge into the atmosphere more than 40 pounds of organic materials in any one day, or more than 8 pounds in any one hour, from any existing affected facility in which any Class II solvent is used unless said discharge has been reduced by at least 85% by weight. (Section 3.2)
- (3) Class III Solvents - No owner or operator shall discharge into the atmosphere more than 3,000 pounds of organic materials in any one day, or more than 450 pounds in any one hour, from any existing affected facility in which any Class III solvent is used unless said discharge has been reduced by at least 85% by weight. (Section 3.3)

2. Regulation 1.05 Requirements (Regulation 1.05, section 4.12).

- a) The owner or operator shall maintain the following daily records to demonstrate ongoing compliance with the hourly and daily VOC emission standards specified for this emission unit.
 - (1) The date and total run hours for each machine for each operating day.
 - (2) The tank level reading for Emission Point E-7
 - (3) The amount of Stoddard solvent used
 - (4) The daily VOC emissions
 - (5) The hourly VOC emissions as determined on a 24-hour average basis

3. Ongoing Compliance Status Reports (Regulation 2.16, section 4.1.9.3)

- a) The owner or operator shall include, at a minimum, the following information in the semi-annual compliance monitoring reports for VOC:
 - (1) Emission Unit/Point ID Number
 - (2) The beginning and ending date of the reporting period
 - (3) Identification of all periods of exceedances of the VOC limits including the quantity of excess emissions
 - (4) Reason for excess emissions
 - (5) Description of corrective action taken to prevent future exceedances

Comment

Stoddard solvent has a vapor pressure less than 1.5 psia; therefore, submerged fill is not required for emission point E-7. Stoddard is a Class III solvent.

Emission Unit Number: U2

Emission Unit Description: Perchloroethylene dry-to-dry cleaning system designated as Unit Number 1 installed in March 1990.

Emission Unit Applicable Regulations:

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
5.02	Federal Emission Standards for Hazardous Air Pollutants Incorporated by Reference	2.10
40 CFR Part 63, Subpart M	National Perchloroethylene Air Emission Standards for Dry Cleaning Facilities	63.320, 63.321, 63.322, 63.323, 63.324 & 63.325

DISTRICT ONLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
5.14	Hazardous Air Pollutants and Source Categories	1 and 2

Emission Unit Allowable Emissions:

See Additional Conditions

Emission Unit Components:

E18 - Dry-to-dry cleaning unit (75 lbs/load)

Additional Conditions

1. The following table summarizes the applicable requirements specified in 40 CFR Part 63, Subpart M for Emission Unit U2.

Standards	Monitoring and Testing	Recordkeeping	Reporting
40 CFR 63.322 (a, c, d, e, I, j, k, l, m, and n)	40 CFR 63.323 (a) and (d)	40 CFR 63.324 (d) and (e)	40 CFR 63.324 (a) and (b)

2. Emission Standards (40 CFR Part 63, Subpart M, 63.322)

- a) The owner or operator shall route the air-perchloroethylene gas-vapor stream contained within each dry cleaning machine through a refrigerated condenser or an equivalent control device. (63.322 (a) (1))
- b) The owner or operator shall close the door of each dry cleaning machine immediately after transferring articles to and from the machine, and shall keep the door closed at all other times. (63.322)

- c) The owner or operator shall operate and maintain the system according to the manufacturer's specifications and recommendations. (63.322 (d))
- d) Each refrigerated condenser used for the purposes of complying with the emission standards and installed on a dry-to-dry machine, dryer, or reclaimer (63.322 (e)):
 - (1) Shall be operated to not vent or release the air-perchloroethylene gas-vapor stream contained within the dry cleaning machine to the atmosphere while the dry cleaning machine drum is rotating.
 - (2) Shall be monitored according to 63.323(a)(1).
 - (3) Shall be operated with a diverter valve, which prevents air drawn into the dry cleaning machine when the door of the machine is open from passing through the refrigerated condenser.
- e) The owner or operator shall drain all cartridge filters in their housing, or other sealed container, for a minimum of 24 hours, or shall treat such filters in an equivalent manner, before removal from the dry cleaning facility. (63.322 I))
- f) The owner or operator shall store all perchloroethylene and wastes that contain perchloroethylene in solvent tanks or solvent containers with no perceptible leaks. (63.322 (j))
- g) The owner or operator of a dry cleaning system shall inspect the following components weekly for perceptible leaks while the dry cleaning system is operating: (63.322 (k))
 - (1) Hose and pipe connections, fittings, couplings and valves
 - (2) Door gaskets and seatings
 - (3) Filter gaskets and seatings
 - (4) Pumps
 - (5) Solvent tanks and containers
 - (6) Water separators
 - (7) Muck cookers and stills
 - (8) Exhaust dampers, diverter valves and cartridge filter housings
- h) The owner or operator of a dry cleaning system shall repair all perceptible leaks detected within 24 hours. If repair parts must be ordered, either a written or verbal order for those parts shall be initiated within 2 working days of detecting such a leak. Such repair parts shall be installed within 5 working days after receipt. (63.322 (m))
- I) If parameter values monitored do not meet the values specified in AC # 3(a), adjustments or repairs shall be made to the dry cleaning system or control device to meet those values. If repair parts must be ordered, either a written or verbal order for those parts shall be initiated within 2 working days of detecting such a parameter value. Such repair parts shall be installed within 5 working days after receipt. 63.322 (n)

3. Monitoring Requirements (40 CFR Part 63, Subpart M, 63.323)

- a) The owner or operator shall measure the temperature of the air-perchloroethylene gas-vapor stream on the outlet side of the refrigerated condenser on a dry-to-dry machine, dryer, or

reclaimer weekly with a temperature sensor to determine if it is equal to or less than 7.2°C (45°F). The temperature sensor shall be used according to the manufacturer's instructions and shall be designed to measure a temperature of 7.2°C (45°F) to an accuracy of $\pm 1.1^\circ\text{C}$ ($\pm 2^\circ\text{F}$). (63.323 (a))

- b) When calculating yearly perchloroethylene consumption for the purpose of demonstrating applicability according to 63.320, the owner or operator shall perform the following calculation on the first day of every month. (63.323 (d))
- 1) Sum the volume of all perchloroethylene purchases made in each of the previous 12 months, as recorded in the log described in AC # 4 (a).
 - 2) If no perchloroethylene purchases were made in a given month, then the perchloroethylene consumption for that month is zero gallons.
 - 3) The total sum calculated pursuant to this condition is the yearly perchloroethylene consumption for this facility.

4. Recordkeeping Requirements (40 CFR Part 63, Subpart M, 63.324)

- a) The owner or operator shall keep receipts of perchloroethylene purchases and a log of the following information and maintain such information on site and show it upon request for a period of 5 years. (63.324 (d))
- 1) The volume of perchloroethylene purchased each month by the dry cleaning facility as recorded from perchloroethylene purchases; if no perchloroethylene is purchased during a given month then the owner or operator would enter zero gallons in the log.
 - 2) The calculation and result of the yearly perchloroethylene consumption determined on the first day of each month.
 - 3) The dates when the dry cleaning system components are inspected for perceptible leaks and the name or location of dry cleaning components where perceptible leaks are detected.
 - 4) The dates of repair and records of written or verbal orders for repair parts.
 - 5) The date and temperature sensor monitoring results as specified in AC # 3(a) above.
- b) The owner or operator shall retain onsite a copy of the design specifications and the operating manuals for each dry cleaning system and each emission control device located at the dry cleaning facility. 63.324 (e)

5. Reporting Requirements

- a) The owner or operator of a dry cleaning facility shall notify the Administrator or delegated State authority in writing within 270 calendar days after September 23, 1993 (i.e., June 18, 1994) and provide the following information: (63.324 (a))
- (1) The name and address of the owner or operator;
 - (2) The address (that is, physical location) of the dry cleaning facility;
 - (3) A brief description of the type of each dry cleaning machine at the dry cleaning facility;

- (4) Documentation as described in 63.323(d) of the yearly perchloroethylene consumption at the dry cleaning facility for the previous year to demonstrate applicability according to 63.320; or an estimation of perchloroethylene consumption for the previous year to estimate applicability with 63.320; and
 - (5) A description of the type of control device(s) that will be used to achieve compliance with 63.322(a) or (b) and whether the control device(s) is currently in use or will be purchased.
 - (6) Documentation to demonstrate to the Administrator's satisfaction that each room enclosure used to meet the requirements of 63.322(a)(3) meets the requirements of 63.322(a)(3)(I) and (ii).
- b) Each owner or operator of a dry cleaning facility shall submit to the Administrator or delegated State authority by registered mail on or before the 30th day following the compliance dates specified in 63.320(b) or June 18, 1994, whichever is later, a notification of compliance status providing the following information and signed by a responsible official who shall certify its accuracy: (63.324 (b))
- (1) The yearly perchloroethylene solvent consumption limit based upon the yearly solvent consumption calculated according to 63.323(d);
 - (2) Whether or not they are in compliance with each applicable requirement of 63.322; and
 - (3) All information contained in the statement is accurate and true.

Emission Unit Number: U3

Emission Unit Description: Perchloroethylene dry-to-dry cleaning system designated as Unit Number 2 installed in June 1994.

Emission Unit Applicable Regulations:

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
5.02	Federal Emission Standards for Hazardous Air Pollutants Incorporated by Reference	2.10
40 CFR Part 63, Subpart M	National Perchloroethylene Air Emission Standards for Dry Cleaning Facilities	63.320, 63.321, 63.322, 63.323, 63.324 & 63.325

DISTRICT ONLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
5.14	Hazardous Air Pollutants and Source Categories	1 and 2

Emission Unit Allowable Emissions:

See Additional Conditions

Emission Unit Components:

E9 - Dry-to-dry cleaning unit (55 lbs/load)

Additional Conditions

1. The following table summarizes the applicable requirements specified in 40 CFR Part 63, Subpart M for Emission Unit U3.

Standards	Monitoring and Testing	Recordkeeping	Reporting
40 CFR 63.322 (b, c, d, e, I, j, k, l, m, and n)	40 CFR 63.323 (a) and (d)	40 CFR 63.324 (d) and (e)	40 CFR 63.324 (a) and (b)

2. **Emission Standards** (40 CFR Part 63, Subpart M, 63.322)

- a) The owner or operator shall route the air-perchloroethylene gas-vapor stream contained within each dry cleaning machine through a refrigerated condenser or an equivalent control device. (63.322 (b))
- b) The owner or operator shall close the door of each dry cleaning machine immediately after transferring articles to of from the machine, and shall keep the door closed at all other times. (63.322)

- c) The owner or operator shall operate and maintain the system according to the manufacturer's specifications and recommendations. (63.322 (d))
- d) Each refrigerated condenser used for the purposes of complying with the emission standards and installed on a dry-to-dry machine, dryer, or reclaimer: (63.322 (e))
 - (1) Shall be operated to not vent or release the air-perchloroethylene gas-vapor stream contained within the dry cleaning machine to the atmosphere while the dry cleaning machine drum is rotating.
 - (2) Shall be monitored according to 63.323(a)(1).
 - (3) Shall be operated with a diverter valve, which prevents air drawn into the dry cleaning machine when the door of the machine is open from passing through the refrigerated condenser.
- e) The owner or operator shall drain all cartridge filters in their housing, or other sealed container, for a minimum of 24 hours, or shall treat such filters in an equivalent manner, before removal from the dry cleaning facility. (63.322 (I))
- f) The owner or operator shall store all perchloroethylene and wastes that contain perchloroethylene in solvent tanks or solvent containers with no perceptible leaks. (63.322 (j))
- g) The owner or operator of a dry cleaning system shall inspect the following components weekly for perceptible leaks while the dry cleaning system is operating: (63.322 (k))
 - (1) Hose and pipe connections, fittings, couplings and valves
 - (2) Door gaskets and seatings
 - (3) Filter gaskets and seatings
 - (4) Pumps
 - (5) Solvent tanks and containers
 - (6) Water separators
 - (7) Muck cookers and stills
 - (8) Exhaust dampers, diverter valves and cartridge filter housings
- h) The owner or operator of a dry cleaning system shall repair all perceptible leaks detected within 24 hours. If repair parts must be ordered, either a written or verbal order for those parts shall be initiated within 2 working days of detecting such a leak. Such repair parts shall be installed within 5 working days after receipt. (63.322 (m))
- I) If parameter values monitored do not meet the values specified in AC # 3(a), adjustments or repairs shall be made to the dry cleaning system or control device to meet those values. If repair parts must be ordered, either a written or verbal order for those parts shall be initiated within 2 working days of detecting such a parameter value. Such repair parts shall be installed within 5 working days after receipt. (63.322 (n))

3. **Monitoring Requirements** (40 CFR Part 63, Subpart M, 63.323)

- a) The owner or operator shall measure the temperature of the air-perchloroethylene gas-vapor stream on the outlet side of the refrigerated condenser on a dry-to-dry machine, dryer, or

reclaimer weekly with a temperature sensor to determine if it is equal to or less than 7.2°C (45°F). The temperature sensor shall be used according to the manufacturer's instructions and shall be designed to measure a temperature of 7.2°C (45°F) to an accuracy of $\pm 1.1^\circ\text{C}$ ($\pm 2^\circ\text{F}$). (63.323 (a)(1))

- b) When calculating yearly perchloroethylene consumption for the purpose of demonstrating applicability according to 63.320, the owner or operator shall perform the following calculation on the first day of every month. (63.323 (d))
- (1) Sum the volume of all perchloroethylene purchases made in each of the previous 12 months, as recorded in the log described in AC # 4 (a).
 - (2) If no perchloroethylene purchases were made in a given month, then the perchloroethylene consumption for that month is zero gallons.
 - (3) The total sum calculated pursuant to this condition is the yearly perchloroethylene consumption for this facility.

4. Recordkeeping Requirements (40 CFR Part 63, Subpart M, 63.324)

- a) The owner or operator shall keep receipts of perchloroethylene purchases and a log of the following information and maintain such information on site and show it upon request for a period of 5 years. (63.324 (d))
- (1) The volume of perchloroethylene purchased each month by the dry cleaning facility as recorded from perchloroethylene purchases; if no perchloroethylene is purchased during a given month then the owner or operator would enter zero gallons in the log.
 - (2) The calculation and result of the yearly perchloroethylene consumption determined on the first day of each month as specified in 63.323(d).
 - (3) The dates when the dry cleaning system components are inspected for perceptible leaks, as specified in 63.322(k) or (l), and the name or location of dry cleaning components where perceptible leaks are detected.
 - (4) The dates of repair and records of written or verbal orders for repair parts to demonstrate compliance with 63.322(m) and (n).
 - (5) The date and temperature sensor monitoring results as specified in AC # 3 (a) above.
- b) The owner or operator shall retain onsite a copy of the design specifications and the operating manuals for each dry cleaning system and each emission control device located at the dry cleaning facility. (63.324 (e))

5. Reporting Requirements

- a) Each owner or operator of a dry cleaning facility shall notify the Administrator or delegated State authority in writing within 270 calendar days after September 23, 1993 (i.e., June 18, 1994) and provide the following information: (63.324 (a))
- (1) The name and address of the owner or operator;
 - (2) The address (that is, physical location) of the dry cleaning facility;
 - (3) A brief description of the type of each dry cleaning machine at the dry cleaning facility;

- (4) Documentation as described in 63.323(d) of the yearly perchloroethylene consumption at the dry cleaning facility for the previous year to demonstrate applicability according to 63.320; or an estimation of perchloroethylene consumption for the previous year to estimate applicability with 63.320; and
 - (5) A description of the type of control device(s) that will be used to achieve compliance with 63.322(a) or (b) and whether the control device(s) is currently in use or will be purchased.
 - (6) Documentation to demonstrate to the Administrator's satisfaction that each room enclosure used to meet the requirements of 63.322(a)(3) meets the requirements of 63.322(a)(3)(I) and (ii).
- b) Each owner or operator of a dry cleaning facility shall submit to the Administrator or delegated State authority by registered mail on or before the 30th day following the compliance dates specified in 63.320(b) or June 18, 1994, whichever is later, a notification of compliance status providing the following information and signed by a responsible official who shall certify its accuracy: 63.324 (b)
- (1) The yearly perchloroethylene solvent consumption limit based upon the yearly solvent consumption calculated according to 63.323(d);
 - (2) Whether or not they are in compliance with each applicable requirement of 63.322; and
 - (3) All information contained in the statement is accurate and true.
- c) Each owner or operator of an area source dry cleaning facility that exceeds the solvent consumption limit reported in paragraph (b) of this section shall submit to the Administrator or a delegated State authority by registered mail on or before the dates specified in 63.320(f) or (I), a notification of compliance status providing the following information and signed by a responsible official who shall certify its accuracy:
- (1) The new yearly perchloroethylene solvent consumption limit based upon the yearly solvent consumption calculated according to 63.323(d);
 - (2) Whether or not they are in compliance with each applicable requirement of 63.322; and
 - (3) All information contained in the statement is accurate and true.

Emission Unit Number: U4

Emission Unit Description: Perchloroethylene dry-to-dry cleaning system designated as Unit Number 3 installed in April 1999.

Emission Unit Applicable Regulations:

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
5.02	Federal Emission Standards for Hazardous Air Pollutants Incorporated by Reference	2.10
40 CFR Part 63, Subpart M	National Perchloroethylene Air Emission Standards for Dry Cleaning Facilities	63.320, 63.321, 63.322, 63.323, 63.324 & 63.325

DISTRICT ONLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
5.14	Hazardous Air Pollutants and Source Categories	1 and 2

Emission Unit Allowable Emissions:

See Additional Conditions

Emission Unit Components:

E10 - Dry-to-dry cleaning unit (90 lbs/load)

Additional Conditions

1. The following table summarizes the applicable requirements specified in 40 CFR Part 63, Subpart M for Emission Unit U4.

Standards	Monitoring and Testing	Recordkeeping	Reporting
40 CFR 63.322 (b, c, d, e, I, j, k, m & n)	40 CFR 63.323 (a) and (d)	40 CFR 63.324 (d) and (e)	40 CFR 63.324 (a) and (b)

2. Emission Standards (40 CFR Part 63, Subpart M, 63.322)

- a) The owner or operator shall route the air-perchloroethylene gas-vapor stream contained within each dry cleaning machine through a refrigerated condenser or an equivalent control device. (63.322 (b))
- b) The owner or operator shall close the door of each dry cleaning machine immediately after transferring articles to of from the machine, and shall keep the door closed at all other times. (63.322)

- c) The owner or operator shall operate and maintain the system according to the manufacturer's specifications and recommendations. (63.322 (d))
- d) Each refrigerated condenser used for the purposes of complying with the emission standards and installed on a dry-to-dry machine, dryer, or reclaimer: (63.322 (e))
 - (1) Shall be operated to not vent or release the air-perchloroethylene gas-vapor stream contained within the dry cleaning machine to the atmosphere while the dry cleaning machine drum is rotating.
 - (2) Shall be monitored according to 63.323(a)(1).
 - (3) Shall be operated with a diverter valve, which prevents air drawn into the dry cleaning machine when the door of the machine is open from passing through the refrigerated condenser.
- e) The owner or operator shall drain all cartridge filters in their housing, or other sealed container, for a minimum of 24 hours, or shall treat such filters in an equivalent manner, before removal from the dry cleaning facility. (63.322 (I))
- f) The owner or operator shall store all perchloroethylene and wastes that contain perchloroethylene in solvent tanks or solvent containers with no perceptible leaks. (63.322 (j))
- g) The owner or operator of a dry cleaning system shall inspect the following components weekly for perceptible leaks while the dry cleaning system is operating: (63.322 (k))
 - (1) Hose and pipe connections, fittings, couplings and valves
 - (2) Door gaskets and seatings
 - (3) Filter gaskets and seatings
 - (4) Pumps
 - (5) Solvent tanks and containers
 - (6) Water separators
 - (7) Muck cookers and stills
 - (8) Exhaust dampers, diverter valves and cartridge filter housings
- h) The owner or operator of a dry cleaning system shall repair all perceptible leaks detected within 24 hours. If repair parts must be ordered, either a written or verbal order for those parts shall be initiated within 2 working days of detecting such a leak. Such repair parts shall be installed within 5 working days after receipt. (63.322 (m))
- I) If parameter values monitored do not meet the values specified in AC # 3(a), adjustments or repairs shall be made to the dry cleaning system or control device to meet those values. If repair parts must be ordered, either a written or verbal order for those parts shall be initiated within 2 working days of detecting such a parameter value. Such repair parts shall be installed within 5 working days after receipt. (63.322 (n))

3. Monitoring Requirements (40 CFR Part 63, Subpart M, 63.323)

- a) The owner or operator shall measure the temperature of the air-perchloroethylene gas-vapor stream on the outlet side of the refrigerated condenser on a dry-to-dry machine, dryer, or reclaimer weekly with a temperature sensor to determine if it is equal to or less than 7.2°C

(45°F). The temperature sensor shall be used according to the manufacturer's instructions and shall be designed to measure a temperature of 7.2°C (45°F) to an accuracy of $\pm 1.1^\circ\text{C}$ ($\pm 2^\circ\text{F}$). (63.323 (a))

- b) When calculating yearly perchloroethylene consumption for the purpose of demonstrating applicability according to 63.320, the owner or operator shall perform the following calculation on the first day of every month. (63.322 (d))
- (1) Sum the volume of all perchloroethylene purchases made in each of the previous 12 months, as recorded in the log described in AC # 4 (a).
 - (2) If no perchloroethylene purchases were made in a given month, then the perchloroethylene consumption for that month is zero gallons.
 - (3) The total sum calculated pursuant to this condition is the yearly perchloroethylene consumption for this facility.

4. Recordkeeping Requirements (40 CFR Part 63, Subpart M, 63.324)

- a) The owner or operator shall keep receipts of perchloroethylene purchases and a log of the following information and maintain such information on site and show it upon request for a period of 5 years. 63.324 (d)
- (1) The volume of perchloroethylene purchased each month by the dry cleaning facility as recorded from perchloroethylene purchases; if no perchloroethylene is purchased during a given month then the owner or operator would enter zero gallons in the log.
 - (2) The calculation and result of the yearly perchloroethylene consumption determined on the first day of each month as specified in 63.323(d).
 - (3) The dates when the dry cleaning system components are inspected for perceptible leaks, as specified in 63.322(k) or (l), and the name or location of dry cleaning components where perceptible leaks are detected.
 - (4) The dates of repair and records of written or verbal orders for repair parts to demonstrate compliance with 63.322(m) and (n).
 - (5) The date and temperature sensor monitoring results as specified in AC # 3 (a) above.
- b) The owner or operator shall retain onsite a copy of the design specifications and the operating manuals for each dry cleaning system and each emission control device located at the dry cleaning facility. (63.324 (e))

5. Reporting Requirements

- a) Each owner or operator of a dry cleaning facility shall notify the Administrator or delegated State authority in writing within 270 calendar days after September 23, 1993 (i.e., June 18, 1994) and provide the following information: (63.324 (a))
- (1) The name and address of the owner or operator;
 - (2) The address (that is, physical location) of the dry cleaning facility;
 - (3) A brief description of the type of each dry cleaning machine at the dry cleaning facility;
 - (4) Documentation as described in 63.323(d) of the yearly perchloroethylene consumption at the dry cleaning facility for the previous year to demonstrate applicability according to 63.320; or an estimation of perchloroethylene consumption for the previous year to estimate applicability with 63.320; and
 - (5) A description of the type of control device(s) that will be used to achieve compliance with 63.322(a) or (b) and whether the control device(s) is currently in use or will be purchased.

- (6) Documentation to demonstrate to the Administrator's satisfaction that each room enclosure used to meet the requirements of 63.322(a)(3) meets the requirements of 63.322(a)(3)(I) and (ii).
- b) Each owner or operator of a dry cleaning facility shall submit to the Administrator or delegated State authority by registered mail on or before the 30th day following the compliance dates specified in 63.320(b) or June 18, 1994, whichever is later, a notification of compliance status providing the following information and signed by a responsible official who shall certify its accuracy: (63.324 (b))
 - (1) The yearly perchloroethylene solvent consumption limit based upon the yearly solvent consumption calculated according to 63.323(d);
 - (2) Whether or not they are in compliance with each applicable requirement of 63.322; and
 - (3) All information contained in the statement is accurate and true.
- c) Each owner or operator of an area source dry cleaning facility that exceeds the solvent consumption limit reported in paragraph (b) of this section shall submit to the Administrator or a delegated State authority by registered mail on or before the dates specified in 63.320(f) or (I), a notification of compliance status providing the following information and signed by a responsible official who shall certify its accuracy:
 - (1) The new yearly perchloroethylene solvent consumption limit based upon the yearly solvent consumption calculated according to 63.323(d);
 - (2) Whether or not they are in compliance with each applicable requirement of 63.322; and
 - (3) All information contained in the statement is accurate and true.

Permit Shield

The owner or operator has requested and is hereby granted a permit shield. The permit shield applies as long as the owner or operator operates in accordance with the terms and conditions of this permit. The following rules have been reviewed by the District and determined not to be applicable to the emission units and/or emission points listed.

Emission Unit U1 was installed prior to December 14, 1982, therefore, is not subject to 40 CFR Part 60 Subpart JJJ, Standards of Performance for Petroleum Dry Cleaners.

Off-Permit Documents

There are no off permit documents associated with this Title V permit

Alternative Operating Scenarios

The company requested no alternative operating scenario in its Title V application.

Source-Wide HAP Speciation	
HAP	CAS #
Perchloroethylene	127-18-4

Insignificant Activities		
Description	Quantity	Basis
Natural Gas Boiler (5.85 MM Btu/Hr heat input capacity)	1	Regulation 2.02, section 2.1.1